

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

NOV 19 2014

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
ABSALOM CARLISLE,)
)
Defendant.)

Case No

4:14CR00367 JAR/TCM

INDICTMENT

COUNT I (Mail Fraud)

The Grand Jury charges that:

1. At all relevant times, the Defendant was a resident of St. Louis County, Missouri within the Eastern District of Missouri. At various times, the Defendant did business through an entity called Clayton Managed Healthcare Services, LLC.

2. Between on or about January 1, 2009 and April 1, 2013, with the exact dates unknown, the Defendant, individually and through his company, agreed to provide in-house care to an elderly individual whose initials are R.H.

3. Because R.H. was of advanced age and unable to reliably care for himself or his affairs by January 1, 2009, the Defendant arranged to provide services for R.H. through R.H.'s children.

4. On or about January 1, 2009, the Defendant agreed to provide in-house care which included housekeeping, meals and general household support for R.H. in his residence in Clayton, Missouri. The Defendant's agreement contemplated the payment of an hourly rate for service as well of the reimbursement of any expenses incurred for the benefit of R.H.

5. On or about January 1, 2009, unbeknownst to R.H.'s children, R.H. maintained three charge accounts with the American Express Company, a financial institution headquartered in the State of New York.

6. Soon after beginning to work for R.H., the Defendant learned of the aforementioned American Express charge accounts. In late February 2009, the Defendant, without lawful authority, ordered supplemental charge cards linked to two of the aforementioned R.H. American Express accounts in the name of "Absalom Carlisle." One such supplemental charge card was delivered to R.H.'s residence by means of the United States mail in January 2011.

7. Between on or about March 1, 2009 and continuing through on or about March 1, 2013, with the exact dates unknown, the Defendant made secret and unauthorized charges on R.H.'s American Express accounts using his supplemental card and account access. The Defendant spent thousands of dollars on furniture, clothing, personal services such as massages, restaurant and bar bills, and online dating sites. Although a small portion of the charges made on these accounts were for the benefit of R.H. and some of the charges made for the benefit of the Defendant were repaid with Defendant's funds, Defendant never had lawful authority from R.H. to make charges to his accounts.

8. From time to time, the Defendant, without lawful authority, would direct funds from R.H.'s financial accounts at UMB Bank and Commerce Bank to pay down the balances he had run up on R.H.'s American Express accounts. Between on or about March 1, 2009 and March 1, 2013, the Defendant misapplied more than \$35,000 of R.H.'s funds to pay down the balances on R.H.'s American Express accounts caused by the Defendant's charges.

9. On March 10, 2013, R.H. died. At the time of his death, there were outstanding balances on R.H.'s American Express accounts in excess of \$20,000 due to the Defendant's charges. The Defendant did not pay these outstanding balances.

10. During the process of closing R.H.'s estate, R.H.'s children discovered the Defendants financial exploitation of R.H. and the resulting outstanding balances on his American Express accounts and confronted the Defendant. The Defendant apologized and acknowledged he should not have made charges on R.H.'s card for his benefit.

11. Between on or about January 1, 2009 and March 1, 2013, within the Eastern District of Missouri and elsewhere, the Defendant,

ABSALOM CARLISLE,

did devise a scheme and artifice to defraud others out of money and property by means of false and fraudulent pretenses, representations and promises and for the purpose of executing the same did place and cause to be placed in a post office or an authorized depository for mail matter, any matter or thing to be sent and delivered by the United States Postal Service, to wit: a supplemental charge card for an American Express financial account held in the name of R.H. ending in 12003 mailed to the residence of R.H. on or about January 12, 2011.

In violation of Title 18, United States Code Section 1341.

COUNTS II and III (Aggravated Identity Theft)

12. The allegations contained in paragraphs 1 through 11 are realleged and incorporated by reference.

13. Between on or about March 9, 2010 and January 7, 2013, within the Eastern District of Missouri and elsewhere, the Defendant,

ABSALOM CARLISLE,

during and in relation to the aforementioned mail fraud scheme described above in Count I, did knowingly transfer, possess and use without lawful authority, the means of identification of R.H., to wit: the linking of bank accounts in the name of R.H. to the American Express financial accounts in the name of R.H. for the purpose of stealing R.H.'s money to pay off charged incurred by the Defendant on R.H.'s American Express accounts:

<u>COUNT</u>	<u>DATE</u>	<u>BANK ACCOUNT</u>
II	March 9, 2010	Commerce Bank Account ending in 8611
III	January 7, 2013	UMB Bank Account ending in 6613

All in violation of Title 18, United States Code Section 1028A.

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Thomas C. Albus, #96250
Assistant United States Attorney